

PATIENT SAFETY INCIDENT RESPONSE POLICY
Policy number BM21F

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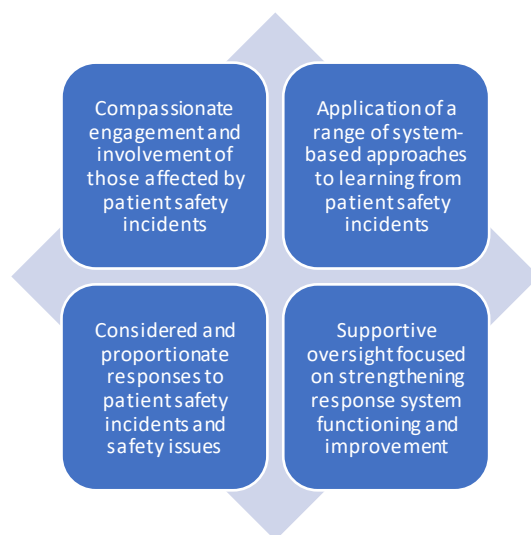
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INTRODUCTION

This policy supports the requirements of the Patient Safety Incident Response Framework (PSIRF) and sets out JDW Consulting Ltd trading as Prestige Nursing & Care’s approach to developing and maintaining effective systems and processes for responding to patient safety incidents and issues for the purpose of learning and improving patient safety.

The PSIRF advocates a co-ordinated and data-driven response to patient safety incidents. It embeds patient safety incident response within a wider system of improvement and prompts a significant cultural shift towards systematic patient safety management.

This policy supports development and maintenance of an effective patient safety incident response system that integrates the four key aims of the PSIRF:



SCOPE

This policy is specific to patient safety incident responses conducted solely for the purpose of learning and improvement across JDW Consulting Ltd trading as Prestige Nursing & Care.

Responses under this policy follow a systems-based approach. This recognises that patient safety is an emergent property of the healthcare system: that is, safety is provided by interactions between components and not from a single component. Responses do not take a 'person-focused' approach where the actions or inactions of people, or 'human error', are stated as the cause of an incident.

There is no remit to apportion blame or determine liability, preventability or cause of death in a response conducted for the purpose of learning and improvement. Other processes, such as claims handling, human resources investigations into employment concerns, professional standards investigations, coronial inquests and criminal investigations, exist for that purpose. The principle aims of each of these responses differ from those of a patient safety response and are outside the scope of this policy.

POLICY OBJECTIVE

To ensure JDW Consulting Ltd trading as Prestige Nursing & Care's approach to patient safety incidents is aligned to NHS England's Patient Safety Incident Response Framework (PSIRF).

POLICY

Our patient safety culture

Prestige Nursing & Care are committed to embedding a 'Just and Learning culture' that facilitates continuous learning, creates psychological safety and focuses upon good practice that is shared and replicated within and beyond organisational boundaries.

Alongside the opportunities to learn from incidents, Prestige Nursing & Care are committed to learning from good practice and supporting one of our values, "Quality made better – ensuring the highest standards of dignity, care and respect for all."

A final component in our patient safety culture is another of our values, "Care made better – compassionate care for those we support and each other," thereby enabling us to understand and engage those effected by patient safety incidents. This includes clients, their families, and Prestige Nursing & Care colleagues.

Prestige Nursing & Care actively encourage and support our team members to record patient safety incidents or concerns via the Incident Management System (IMS).

Prestige Nursing & Care encourages colleagues to access National Speak Up Service.

Prestige Nursing & Care promote a 'Just Culture' approach to patient safety response activities and improvement works

Prestige Nursing & Care are clear that patient safety incident responses are conducted for the sole purpose of learning and identifying system improvements to reduce risk.

Prestige Nursing & Care have responsible individuals at all levels of the organisation which consider risks and incidents that have occurred to share learning and regularly review incidents via our Incident Management System.

Patient safety partners

Working in partnership with clients (patients) is not a new concept and Patient Safety Partners are considered a key element in the implementation of the PSIRF. Prestige Nursing & Care are committed to involving clients (patients), families and carers in improving care and services and, have a number of mechanisms in place to enable and encourage the voice of patients (clients) to be heard via:

- Client Engagement surveys
- Duty of Candour process
- Complaints process
- Client feedback process
- Telephone Quality Monitoring (TQM) surveys

Addressing health inequalities

Prestige Nursing & Care recognise our role in tackling health inequalities in partnership with our local partner agencies and services and will ensure that no one is disproportionately impacted on the grounds of their specific characteristics.

Prestige Nursing & Care will aim to identify and address any particular features of an incident that indicates health inequalities may have contributed to harm or demonstrates a risk to a particular population group, including all protected characteristics (age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation).

Through implementation of PSIRF, Prestige Nursing & Care will seek to utilise data and learning from investigations to identify actual and potential health inequalities and make recommendations to our directors and partner agencies on how to tackle these.

Our engagement with patients (clients), families and colleagues following a patient safety investigation will recognise diverse needs and ensure inclusivity for all.

Engaging and involving patients, families and colleagues following a patient safety incident

The PSIRF recognises that learning and improvement following a patient safety incident can only be achieved if supportive systems and processes are in place. It supports the development of an effective patient safety incident response system that prioritises compassionate engagement and involvement of those affected by patient safety incidents (including patients (clients), families and Prestige Nursing & Care colleagues). This involves working with those affected by patient safety incidents to understand and answer any questions they have in relation to the incident and signpost them to support as required.

Prestige Nursing & Care are firmly committed to continuously improving the care and services we provide. Prestige Nursing & Care want to learn from any incident where care does not go as planned or expected by our patients (clients), their families, or Prestige Nursing & Care colleagues.

Prestige Nursing & Care recognise the significant impact patient safety incidents can have on those involved. Getting involvement right in how Prestige Nursing & Care respond to incidents is crucial, particularly to support improving the services Prestige Nursing & Care provide.

Part of this involves our commitment to being open and honest whenever there is a concern about care not being as planned or expected or when a mistake has been made. As well as meeting our professional and regulatory requirements for Duty of Candour, Prestige Nursing & Care are committed to being open and transparent with our patients (clients), families and Prestige Nursing & Care colleagues because it is the right thing to do. This is regardless of the level of harm caused by an incident.

Saying sorry is always the right thing to do. It is not an admission of liability. It acknowledges that something could have gone better and is the first step to learning from what happened and prevent it happening again. The regulatory aspects of Duty of Candour are monitored through our Incident Management System (IMS).

Written information provided to patients and families, including in fulfilment of duty of candour, will be tailored to the individuals taking into consideration their questions, concerns and wishes.

All patient safety incidents will be reported utilising the Incident Management System.

All Prestige Nursing & Care colleagues are encouraged to be transparent and open whenever there is a concern about care not being as planned or expected, or when a mistake has been made regardless of the level of harm involved. This is emphasised in our incident management policies and in our induction. All Prestige Nursing & Care colleagues will follow our Duty of Candour policy.

Prestige Nursing & Care recognise that Prestige Nursing & Care colleagues need to continually feel supported to speak out and openly report incidents and

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concerns without fear of recrimination or blame. Prestige Nursing & Care will continue to provide support and guidance whilst promoting an open and Just Culture to support this.

When Prestige Nursing & Care colleagues are interviewed as part of an investigation / learning response, the interview will be conducted in line with the Just Culture guide document produced by the National Patient Safety Agency's Incident Decision Tree. The Just Culture guide has been shared with our HR Director and will be incorporated into the HR policies at their next revision of the HR policies.

Patient safety incident response planning

PSIRF supports organisations to respond to incidents and safety issues in a way that maximises learning and improvement, rather than basing responses on arbitrary and subjective definitions of harm. Beyond nationally set requirements, organisations can explore patient safety incidents relevant to their context and the populations they serve rather than only those that meet a certain defined threshold. There will be a focus on areas where there is potential for learning, and using the newer learning response types, safety processes will become more efficient and existing resources can be used more effectively.

Resources And Training To Support Patient Safety Incident Response

Understanding our capacity to respond to incident enables us to be strategic and proportionate in proactively allocating resources to responding to patient safety incidents that are not included on the list of national priorities. Our PSIRP provides specific details on which incidents will require a Patient Safety Incident Investigations (PSII).

Prestige Nursing & Care do not have a dedicated patient safety team however learning responses will be undertaken by Prestige Nursing & Care branch colleagues within the services with support from the central Quality and Clinical Services team as required.

All Prestige Nursing & Care branch colleagues are required to complete the Patient Safety Syllabus Level 1 training "Essentials of Patient Safety", and this is included in the "Required" list of training.

All Prestige Nursing & Care branch colleagues undertaking Patient Safety Reviews (PSRs) and Patient Safety Incident Investigations (PSIIs) are expected to be able to:

- Apply human factors and systems thinking principles to gather qualitative and quantitative information from a wide range of sources.
- Summarise and present complex information in a clear and logical manner and in report form.
- Manage conflicting information from different internal and external sources.
- Communicate highly complex matters and in difficult situations.

PSRs and PSIs should not be undertaken by those who directly line manage team members involved in the incident. PSRs and PSIs are not to be undertaken in isolation, and they will be supported by their management team with time and resources to enable them to complete the learning response to a high standard. The Quality & Clinical Services teams will support learning responses wherever possible and can provide advice on cross-system working where this is required.

Prestige Nursing & Care will utilise both internal and, if required, external subject matter experts with relevant knowledge and skills, where necessary, when PSRs and PSIs are being undertaken to provide expertise (e.g., clinical, or human factors review), advice and critical review of draft reports.

Our patient safety incident response plan

Our plan sets out how Prestige Nursing & Care intend to respond to patient safety incidents over the next 12 months. The plan is not a permanent set of rules that cannot be changed, it is a 'living document' that will be appropriately amended and updated as Prestige Nursing & Care use it to respond to patient safety incidents.

Reviewing our patient safety incident response policy and plan

Prestige Nursing & Care will remain flexible and consider the specific circumstances in which each patient safety incident occurred and the needs of those affected, as well as the plan.

As well as reviewing the plan annually to ensure our focus remains up to date, Prestige Nursing & Care will meet Integrated care boards (ICBs) to discuss trends across the areas Prestige Nursing & Care have looked at to inform our initial Patient Safety Profile.

Based on the size of our organisation and ensuring proportionality, Prestige Nursing & Care will agree with our lead ICB if a rigorous planning exercise is required and if so, how often this will take place so that Prestige Nursing & Care continue to be balanced between learning and improvement.

Our patient safety incident response plan details how this has been achieved as well as how Prestige Nursing & Care will meet both national and local focus for patient safety incident responses.

PROCEDURE

Responding to patient safety incidents and Patient safety incident reporting arrangements

Patient safety incident reporting will remain in line with our Accident & Incident policy and Serious Incident Response policy and where appropriate and in line with the policy escalated to Prestige Nursing Ltd via SIR@prestige-nursing.co.uk .

All Prestige Nursing & Care colleagues are responsible for reporting any potential or actual safety incidents/events and all incidents must be recorded on the Incident Management System.

The Registered Manager will ensure any incidents that require cross system or partnership engagement are identified and shared through existing channels and networks, and that partnership colleagues are fully engaged in investigations and learning as required. Likewise, Prestige Nursing & Care will ensure we are responsive to incidents reported by partner colleagues that require input from the us, primarily by directing enquires to the relevant clinical teams or colleagues and seeking assurance that engagement, information sharing and learning has been achieved, or taken forward.

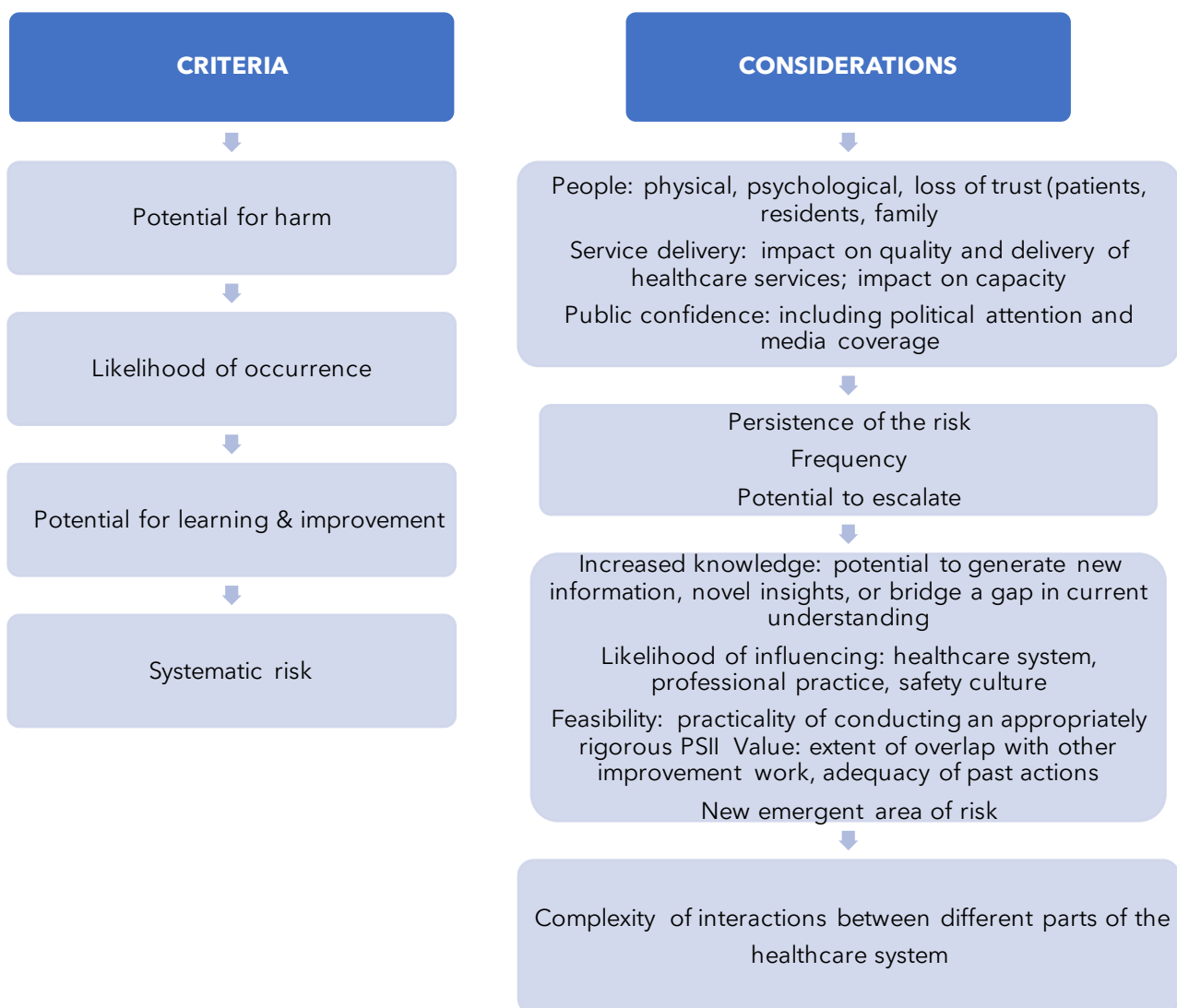
Certain incidents require external reporting to national bodies such as HSSIB, HSE, RIDDOR and MHRA. Please refer to our Accident & Incident policy and Serious Incident Response policy for full details and guidance.

Prestige Nursing & Care are currently not reporting on NRLS directly but do so via our ICB and will continue to use the same process for PSII's.

Patient safety incident response decision-making

Reporting of incidents will continue in line with our existing policy and guidance. Prestige Nursing & Care have governance and assurance systems in place to ensure oversight of incidents at both a service and organisational level to ensure the following arrangements are in place:

- Identification and escalation of any incidents that have or may have caused significant harm.
- (Moderate, severe or death) where duty of candour would apply.
- Identification of themes, trends or clusters of incidents within a specific service.
- Identification of themes, trends or clusters of incidents relating to specific types of incidents.
- Identification of any incidents relating to local risks and issues.
- Identification of any incidents requiring external reporting or scrutiny (eg – never events, deaths, RIDDOR).
- Identification of any other incidents of concern, such as serious near-misses or significant failures in established safety procedures.



The principles of proportionality and a focus on incidents that provide the greatest opportunity for learning will be central to this decision making. This may often mean no further investigation is required, especially where the incident falls within one of the improvement themes identified in our Patient safety incident response Plan (PSIRP).

The PSIRF does not set further national rules or thresholds to determine what method of response should be used to support learning and improvement. Prestige Nursing & Care have used the PSIRF guidance documents to develop our response mechanisms to balance the effort between learning through responding to incidents or exploring issues and improvement work.

Prestige Nursing & Care's COO will have responsibility for the consideration of incidents for PSII or PSR and the approval of PSII/PSR reports. Once PSRs and PSIIs have been completed with Prestige Nursing & Care colleagues, patient (clients), families and carers engagement, the reports are to be reviewed by the Managing Director and then forwarded to SIR@prestige-nursing.co.uk for approval.

The Incident Management System (IMS) has a mandatory field for “Lessons Learned,” which will enable learning throughout the organisation to take place.

In some cases where a PSII for system learning is not indicated, another response may be required. As part of this approach, incidents requiring other types of investigation and decision making, which lie outside the scope of this work, will be appropriately referred as follows and may require reporting via SIR@prestige-nursing.co.uk (see Serious Incident Response policy):

- Professional conduct/competence – referred to HR.
- Establishing liability – referred to the Managing Director.
- Patient dissatisfaction with experience of care – refer to Complaints Procedure.
- Cause of death – referred to the Medical Examiner (via local Trust /or GP) and HM Coroner’s office.
- Criminal – referred to the police.

Responding to cross-system incidents/issues

Where incident investigation beyond managerial review demonstrates overlap with another local provider, a joint investigation will be completed. The recommendation for response type will be considered internally and then negotiated with the other organisation to agree a clear response route and Terms of Reference.

Prestige Nursing & Care’s Registered Manager will forward incidents identified as presenting potential for significant learning and improvement for another provider directly to that organisation’s patient safety team or equivalent. The sharing of incidents will always be coordinated between Prestige Nursing & Care and the patient safety teams across other organisations.

Prestige Nursing & Care will work with partner providers and the relevant ICBs to establish and maintain robust procedures to facilitate the free flow of information and minimise delays to joint working on cross-system incidents.

Timeframes for learning responses

Where a learning response is indicated, the investigation must be started as soon as possible after the patient safety incident is identified and should ordinarily be completed within one to three months of their start date. The national requirement is that no local PSII should take longer than six months, Prestige Nursing & Care realise the impact a patient safety incident can have for a patient/resident/Clients and will aim to ensure that any learning response that we undertake is completed within 3 months.

The time frame for completion of a learning response will be considered on an individual basis and be agreed with those affected by the incident, Prestige Nursing & Care will do our best to draw a balance between conducting a

thorough learning response and the impact that extended timescales can have on those involved in the incident.

In exceptional circumstances, a longer timeframe may be required, and, in this case, any extended timeframe will be agreed between Prestige Nursing & Care and those affected by the incident.

Safety action development and monitoring improvement

Learning responses should not describe recommendations as this can lead to premature attempts to devise a solution - safety actions in response to a defined area for improvement depend on factors and constraints outside of the scope of a learning response.

To achieve successful improvement safety, action development will be completed in a collaborative way with a flexible approach using quality improvement methodology to ensure the actions are:

- Clearly defined.
- Describe responsibilities and timescales.
- Aligned to reportable outcome measures.
- Include a detailed assurance / monitoring process.

Safety improvement plans

Each Prestige Nursing & Care branch will develop their own safety improvement plans, rather than one for the whole organisation, the reason for this is due to some branches being franchised owned, rather than organisationally.

Prestige Nursing & Care will use the process for development of safety actions as outlined by NHS England in the Safety Action Development Guide (2022) The process emphasises a collaborative approach throughout, including involvement of those beyond the 'immediate and obvious' professional groups and working closely with those with improvement expertise.

Safety improvement plans bring together findings from various responses to patient safety incidents and issues. Each branch has a continuous service improvement plan (CSIP) in place which will include actions from the safety improvement plan. The CSIPs are monitored via our quality assurance framework.

Oversight roles and responsibilities

Outlined below are our roles and responsibilities in relation to its recording of, response to and monitoring of patient safety incidents, including investigator responsibilities and the upholding national standards relating to patient safety incidents as per the PSIRF.

Operations Director - has a responsibility to ensure that they receive assurance that this policy is being implemented, that lessons are being learnt, and areas of vulnerability are improving.

Branch Manager– Lead for overseeing implementation of PSIRF, has delegated accountability for ensuring that Prestige Nursing & Care have robust patient safety, quality and governance processes in place, including processes for recording and responding to patient safety incidents.

The effectiveness of the implementation of this policy will be monitored by the **Quality and Compliance Lead** provided on the following indicators:

- Number of learning responses initiated in line with the PSIRF plan.
- The completion of Duty of Candour to expected timeframes.
- The completion of improvement actions to expected timeframes.

The Branch Manager is also responsible for monitoring the patient safety incident response plan and ensuring clear communications with all relevant internal and external parties.

Complaints and appeals

Prestige Nursing & Care will focus on quality improvement and supporting those affected by patient safety incidents, therefore it is expected that all actions to support a proportionate and thorough investigation following a patient safety event will be delivered.

This process should be fully inclusive of the considerations for those affected by the incident, however where Clients/patients and or families / friends do not feel the response to the patient safety incident has been appropriate or that they have not been supported appropriately a right to raise a concern or complaint will remain.

All people affected by a patient safety incident who wish to raise a concern or complaint can do so via the complaint's procedure.

TRAINING

Access to training can be obtained via [NHS Patient Safety Syllabus training - elearning for healthcare](#)

Training	Delivery Method	Role
Level 1 - Essentials for patient safety	e-learning	All staff
Level 1 - Essentials for Patient Safety for Boards and Senior Leadership Teams	e-learning	Franchisee Registered Manager Branch Manager
Level 1 - Introduction to Human Factors / Ergonomics for Patient Safety	e-learning	All staff
Level 2 - Access to Practice	e-learning	Staff involved in direct patient care

ASSOCIATED DOCUMENTS & LEGISLATION

Accident & Incident Policy
Serious Incident Policy
Duty of Candour Policy
Complaints Procedure

Supporting form

Patient safety incident response policy Plan

[NHS England » Patient safety incident response framework and supporting guidance](#)

REVIEW SCHEDULE

This policy will be reviewed on a minimum of two-yearly basis or as required.

Version	Date	Changes by	Approved by	Updated from previous Version
1	March 2025	S Ghent	S Ghent K McGinn	First version